

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DAVID E. KAPLAN, et al.,

Plaintiffs,

- against -

S.A.C. CAPITAL ADVISORS, L.P., et al.,

Defendants.  
-----X

No. 12 Civ. 9350 (VM) (KNF) (Kaplan)

**ECF CASE**

**NOTICE OF PLAINTIFFS' MOTION FOR  
RELIEF FROM PSLRA DISCOVERY STAY**

PLEASE TAKE NOTICE that, pursuant to Section 21D(b)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4(b)(3)(B), Lead Plaintiffs David E. Kaplan, Roxy D. Sullivan, Lindsey Rankin, Michael S. Allen and Chi-Pin Hsu, together with plaintiff Gary W. Muensterman (collectively, the "*Kaplan* Plaintiffs"), hereby move this Court on a date and at such time as may be designated by the Court, at the United States District Court for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, for an Order granting relief from the PSLRA discovery stay.

This Motion is based on the accompanying Memorandum of Law in support thereof, the Declaration of Ethan D. Wohl dated June 24, 2013, and exhibits annexed thereto, all prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

Dated: New York, New York  
June 24, 2013

Respectfully submitted,

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